

**REMARKS**

Claims 1-16 are pending in this application. By this Amendment, claims 1, 3 and 7-12 are amended, and new claims 13-16 are added.

Reconsideration of the application is respectfully requested in view of the above outlined amendments and the following remarks.

Applicants thank Examiners Vaughn and Nguyen for the courtesy extended to Applicants' representative, Mr. Luo, during the August 12, 2004 personal interview. The substance of the personal interview is incorporated in the following remarks.

The Office Action objects to claims 6 and 8-12. Claims 8-12 are amended to overcome this objection by correcting their dependency from claim 6 to claim 7. Accordingly, withdrawal of the objection to claims 6 and 8-12 is respectfully requested.

The Office Action rejects claims 1-12 under 35 U.S.C. §103(a) over U.S. Patent No. 5,875,446 to Brown et al. in view of U.S. Patent No. 5,835,905 to Pirolli. This rejection is respectfully traversed.

The Office Action asserts that the combination of Brown and Pirolli renders obvious the subject matter recited in claim 1. Applicants respectfully submit that Brown and Pirolli do not disclose or suggest determining a connection topology of a collection of content portions, the connection topology including a plurality of connections, each of the plurality of connections being contained in a respective one of the content portions included in the collection of content portions and connecting the respective one of the content portions to another of the content portions; and determining proximal information cue words associated with each connection, as recited in claim 1, and similarly recited in claim 7.

As discussed during the personal interview, Brown discloses grouping objects based on whether the objects are relevant to a query. See col. 6, lines 31-63. A user enters a query 310 to identify a subset of the objects in a hit-list of topically related objects. See Fig. 10, and col. 12, line 53 - col. 13, line 9.

Applicants respectfully submit that Brown merely discloses identifying objects based on their relevance with the contents of a query. Brown does not disclose or suggest determining proximal information cue words associated with each connection in a connection topology of the objects and contained in an object. Therefore, Brown does not disclose or suggest determining a connection topology of a collection of content portions, the connection topology including a plurality of connections, each of the plurality of connections being contained in a respective one of the content portions included in the collection of content portions and connecting the respective one of the content portions to another of the content portions; and determining proximal information cue words associated with each connection, as recited in claims 1 and 7.

As discussed during the interview, Pirolli discloses automatically categorizing web pages in a collection and predicting the relevance of the pages in the collection with respect to a particular web page. See col. 3, lines 19-27. Applicants respectfully submit that Pirolli discusses the relevance of web pages with respect to a particular web page, but does not disclose or suggest determining proximal information cue words associated with each connection in a connection topology of the collection of the web pages and contained in a web page. Therefore, Pirolli does not disclose or suggest determining a connection topology of a collection of content portions, the connection topology including a plurality of connections, each of the plurality of connections being contained in a respective one of the content portions included in the collection of content portions and connecting the respective

one of the content portions to another of the content portions; and determining proximal information cue words associated with each connection, as recited in claims 1 and 7. Thus, Pirolli does not supply the subject matter lacking in Brown.

For at least the above reasons, Brown and Pirolli do not disclose or suggest the subject matter recited in independent claims 1 and 7. Accordingly, the claims are patentably distinct from Brown and Pirolli even if Brown and Pirolli were combined.

Applicants further submit that claims 2-6 and 8-12 are each patentable by virtue of their dependency on claims 1 and 7, respectively, as well as for the additional features they recite.

Accordingly, withdrawal of the rejection of claims 1-12 under 35 U.S.C. §103(a) is respectfully requested.

Additionally, Applicants respectfully submit that new claims 13-16 are each patentable by virtue of their dependency on claims 1 and 7, respectively, as well as for additional features they recite.

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1-16 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



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